



Sam Amini
 Jeffrey T. Baron
 Richard B. Brown
 Robert B. Brown
 Isaac M. Dana
 Jennifer Devenuti
 Paul Duer
 Gerard Ferrara++
 Christopher Fingerhut
 Eric Flores
 James G. Flynn
 Anthony E. Graziani
 Gilbert J. Hardy
 Erin E. Hennessy
 Ashley A. Hughes
 Timothy F.X. Jones
 Tara M. Kennedy
 William Q. Kleinfelder
 Malachy Lyons
 Charles S. Mailloux
 Emelybel Vasquez Molina
 Annmarie C. Montano
 Colin F. Morrissey
 Dawn A. Munro
 Kevin J. Philbin
 Deborah S. Reed
 Lester C. Rodrigues
 Laurine M. Rubin*
 Francis J. Scahill
 Rosario G. Sicuranza
 Jesse M. Squier**
 David J. Tetlak
 Keri A. Wehrheim
 Kelly E. Wright

OF COUNSEL:
 Brian M. Hussey
 Louis A. Pratt

ALSO ADMITTED
 ++ New Jersey
 * Colorado
 **Arizona

Via ECF

Hon. Nusrat J. Choudhury, U.S.D.J.
 United States District Court
 Eastern District of New York
 100 Federal Plaza, Courtroom 1040
 Central Islip, NY 11722-4438

Re: Deo, et al. v. Baron, et al.,
 Case No.: 2: 24-cv-6903 (NJC)
 Our Claim No. UT10440769

Dear Judge Choudhury:

Please accept this request for clarification of the answer deadline for our clients in the above-referenced matter. We represent defendants Ronald Baron, Joshua Aaronson, Jory Baron, Marcello Sciarrino, Daniel O'Sullivan, Brian Chabrier, Wendy Kwun, Iris Baron, Raymond Phelan, Asad Khan, Estate Of David Baron, and Island Auto Group of New York LLC a/k/a Island Auto Group of NY LLC a/k/a Island Auto Group (collectively the "Island Auto defendants"). This request for clarification is also joined by counsel for defendant Baron Nissan Inc. d/b/a Baron Nissan.

We respectfully request herein that the Court confirm that the deadline for the Island Auto defendants to answer plaintiff's amended complaint is stayed pending the resolution of the remand issue, which is currently being litigated before this Court. We note the prior Order of this Court dated March 8, 2025 stating:

The briefing schedule set forth in the November 20, 2024 Order is stayed pending resolution of the question of this Court's jurisdiction over this action.

On November 22, 2024, however, Magistrate Wicks ordered our clients, the Island Auto defendants to answer or otherwise respond to the complaint or any amended complaint by April 1, 2025.

It would seem to stand to reason that our clients' time to answer or otherwise respond would *or should* also be stayed along with the rest of the November 20, 2024 briefing schedule mentioned in the aforesaid March 8, 2025 order.

If we have misunderstood, and if our clients' answer is indeed still due by April 1, 2025, we ask that same be clarified, so that we can protect our clients' interests accordingly.

Thank you very much for your assistance and understanding herein.

Sincerely yours,

SCAHILL LAW GROUP P.C.

Jeffrey Baron

JEFFREY T. BARON, ESQ.

cc All parties via ECF